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10 **UNITED STATES BANKRUPTCY COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**
12 **SAN JOSE DIVISION**

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In re)	Case No.: 03-56788 asw
TELEPATH CORPORATION,)	Chapter 11
 Debtor.)	MOTION TO COMPEL PAYMENT OF
)	ACCOUNTANT FEES
)	Date:
)	Time:
)	Judge Arthur S. Weissbrodt

15 THE MOTION OF THE SIRESS GROUP represents as follows:

16 1. On August 31, 2009 at 2:15 p.m., the Court conducted a hearing on various matters involving
17 the Debtor entity. Those matters included the professional fees and expenses incurred by
18 various professionals who had been employed by the Debtor. Among those professionals was
19 the Movant herein, The Siress Group (“Siress”).
20 2. Siress had previously applied to the Court and the Court approved professional fees. The
21 unpaid balance of the professional fees which had been approved up through and including the
22 August 31st hearing was \$19,677.00.
23 3. At the August 31st hearing, the Court ordered and directed that the Debtor pay to The Siress
24 Group the \$19,677.00.
25 4. As is more fully set forth in the Declaration of Jenna Siress in support of this Motion, demand
26 has been made upon the Debtor for payment of the \$19,677.00, but the Debtor’s principal has
27 refused to pay the \$19,677.00.
28 5. As further set forth in the Declaration of Jenna Siress, the Movant does not have sufficient

1 funds to allow it to pay certain operating expenses which are owed by the Movant as of
2 September 30, 2009. The principal of the Movant, Jenna Siress, will have to personally
3 borrow monies in order to meet the financial obligations of the Movant which are due on
4 September 30, 2009.

5 6. The Movant is requesting that the Court issue an order compelling and requiring the Debtor
6 to pay the \$19,677.00 by September 30th, and further, awarding the Movant attorney fees and
7 cost incurred in having to bring before the Court the within Motion, and for such other relief
8 as the Court may deem appropriate.

9 DATED September 28, 2009.

10 /s/ Charles B. Greene
11 CHARLES B. GREENE

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